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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

ERIC DONALD JOHNSON,

Defendant.

Case No. 2:23mj594 CMR

FELONY COMPLAINT

COUNT 1: 18 U.S.C. § 922(g)(1)  
Felon in Possession of Firearms

Judge Cecilia M. Romero

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Before the Honorable Cecilia M. Romero, United States Magistrate Judge for the  
District of Utah, appeared the undersigned, who on oath deposes and says:

**COUNT 1**  
**18 U.S.C. § 922(g)(1)**  
**(Felon in Possession of Firearms)**

On or about June 20, 2023, in the District of Utah,

ERIC DONALD JOHNSON,

defendant herein, knowing he had been convicted of a crime punishable by a term of  
imprisonment exceeding one year, did knowingly possess firearms, to wit: a .357 Magnum  
revolver, a Bul Armory .45 caliber 1911 handgun, a Zastava arms AK-47 rifle, a Riley

Defense AK-47 rifle, a .357 Magnum revolver, a Fap Fllipietta .357 revolver, a Glock 22 .40 caliber handgun, a Scorpion .22 caliber handgun, a Glock 19 Trump edition handgun, a Ruger AR-15 rifle, and a Citadel Shotgun, and the firearms were in and affecting commerce; all in violation of 18 U.S.C. § 922(g)(1).

This Complaint is made on the basis of investigation described in the affidavit below, and with the following elements for the charged counts as follows:

The elements of Count 1, violation of 18 U.S.C. § 922(g), Felon in Possession of Firearms, are:

- a. The defendant knew he had been convicted of an offense punishable by more than one year;
- b. The defendant knowingly possessed firearms; and
- c. The firearms the defendant knowingly possessed were in and affecting commerce.

#### **AFFIDAVIT IN SUPPORT OF COMPLAINT AND ARREST WARRANT**

Complainant, Brett Taylor, being duly sworn, hereby states that this Felony Complaint is based on information obtained through an investigation consisting of the following:

1. Your affiant is an investigative or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18, United States Code, and am empowered by law to conduct investigations of and to make arrests for offenses enumerated in Section 2516 of Title 18, United States Code. Your affiant has been so employed by the FBI since February of 2022. Your affiant is currently assigned to the

FBI Wasatch Metro Drug Task Force (WMDTF) and is tasked with investigating street gangs and drug trafficking. Your affiant is familiar with the appearance, function, and terminology regarding firearms through my training, experience, and observation. Your affiant is familiar with the facts and circumstances alleged in this complaint.

2. On or about June 20, 2023, Eric Donald JOHNSON, in a conversation over a social media platform, advised an undercover law enforcement officer (UCO1) that he had multiple firearms available for purchase. Based on this conversation, UCO1 arranged to purchase a shotgun from JOHNSON.

3. JOHNSON then told UCO1 to come over to JOHNSON's home in Layton, Utah, to complete the transaction. UCO1, accompanied by a number of other law enforcement agents, traveled to JOHNSON's home and, upon their arrival, agents observed JOHNSON leaving his home and walking towards UCO1 with a Citadel shotgun in his hand. Agents detained JOHNSON and also located a .357 Magnum revolver in JOHNSON's pocket.

4. Agents then sought and obtained a search warrant for JOHNSON's residence. While searching JOHNSON's home, pursuant to the search warrant, agents located multiple additional firearms, including a Bul Armory .45 caliber 1911 handgun, a Zastava arms AK-47 rifle, a Riley Defense AK-47 rifle, a .357 Magnum revolver, a Fap Ellipietta .357 revolver, a Glock 22 .40 caliber handgun, a Scorpion .22 caliber handgun, a Glock 19 Trump edition handgun, and a Ruger AR-15 rifle.

5. In a post-*Miranda* interview with agents, JOHNSON admitted to knowing

he was a felon and admitted attempting to sell firearms for money.

6. Based on training and experience, your affiant knows that all of the firearms seized from JOHNSON and his residence were manufactured outside of the State of Utah, and, thus, traveled in interstate commerce at some point prior to coming into JOHNSON's possession.

7. Finally, I am familiar with JOHNSON's criminal history and know that JOHNSON was convicted of two felony offenses, Possession with Intent to Distribute a Controlled Substance, and Purchase, Transfer, Possession, or Use of a Firearm by a Restricted Person, on August 14, 2019, in Utah's Second District Court (Case No. 181902198).

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Based on the foregoing information, I respectfully request an arrest warrant be issued for ERIC DONALD JOHNSON for violations of 18 U.S.C. § 922(g)(1), Felon in Possession of Firearms.



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Brett Taylor, Affiant  
Special Agent  
Federal Bureau of Investigation

SUBSCRIBED AND SWORN TO BEFORE ME this 21<sup>st</sup> day of June 2023.



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CECILIA M. ROMERO  
United States Magistrate Judge

APPROVED AS TO FORM:

TRINA A. HIGGINS  
United States Attorney

*/s/ Stephen L. Nelson*

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STEPHEN L. NELSON  
Assistant United States Attorney